

April 14, 2020

VIA ECF

Hon. Frederic Block
United States District Court Judge
United States Courthouse
225 Cadman Plaza East
Courtroom 10C South
Brooklyn, NY 11201

Re: *United States v. Andrew Campos, 19-cr-575*

Dear Judge Block:

We represent Andrew Campos in the above-captioned case. We write to request modification of Mr. Campos' conditions of release to permit him to run local errands with prior notice and approval from Pretrial Services.

Mr. Campos' current bail conditions require that he remain on home detention with GPS monitoring at his family home in Scarsdale, NY. (*See* Dkt. 104.) He is only permitted to leave his home for medical and legal visits in New York City and Westchester County, which must be pre-approved by Pretrial Services. During this unprecedented COVID-19 pandemic, however, Mr. Campos' family requires his assistance in running errands at the local grocery store and pharmacy. Accordingly, we respectfully request that the Court modify Mr. Campos' conditions of release to permit him to go grocery shopping, and to the pharmacy with prior approval from Pretrial Services.

We have conferred with Assistant United States Attorney Keith Edelman, and Pretrial Services Officer Celine Ferguson who do not object to this request.

Respectfully submitted,

/s/ HEM
Henry E. Mazurek
Ilana Haramati
Meister Seelig & Fein LLP
125 Park Avenue, Suite 700
New York, New York 10017

Counsel for Defendant Andrew Campos

cc: Counsel of Record (*via ECF*)